

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	
)	
v.)	No. 4:20-CR-174 SEP/NAB (SRW)
)	
DELEO BARNER)	
)	
Defendant.)	

MOTION TO MODIFY BOND CONDITIONS

Mr. DeLeo Barner, through counsel, respectfully requests that this Court modify his bond conditions to change his level of location monitoring. In support, Mr. Barner states the following:

1. Mr. Deleo Barner had his initial appearance on August 30, 2021 (Doc #8);
2. On September 14, 2021, the Court denied the Government's detention motion, releasing Mr. Barner on certain conditions (Doc # 21);
3. One of those conditions was location monitoring under home detention restrictions (Doc #24);
4. Since that time, Mr. Barner has incurred no pretrial release violations and has faithfully abided by his conditions, but the restriction level of location monitoring has made it difficult for him;
5. After consultation with the Pretrial Services Office, Mr. Barner is requesting to change to a curfew from the home detention program;

WHEREFORE Mr. Barner respectfully requests that this Court modify his bond conditions to change him to curfew.

Respectfully submitted,

/s/Melissa K. Goymerac

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on January 5, 2022, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the United States Attorney.

/s/Melissa K. Goymerac
MELISSA K. GOYMERAC
Assistant Federal Public Defender